



United States Environmental Protection Agency  
Region III  
Analytical Services & Quality Assurance Branch



# **Users' Guide for Acquiring Analytical Services**

**Revision 5  
August, 2005**

Environmental Science Center  
701 Mapes Road  
Fort Meade, Maryland 20755-5350

## Users' Guide for Acquiring Analytical Services

Issued by the Analytical Services & Quality Assurance Branch  
(ASQAB)

Effective Date: August 23, 2005

Number: Revision 5

Revision Date: August 23, 2005

### Author

Name: Daniel V. Slizys

Date: August 23, 2005

Signature: *Daniel V. Slizys* /s/

### Reviewer

Name: Cynthia C. Metzger

Date: August 23, 2005

Signature: *Cynthia C. Metzger* /s/

### Approval

Name: Patricia J. Krantz

Title: Director, ASQAB

Signature: *Patricia J. Krantz* /s/

Date: August 23, 2005

# Table of Contents

Section	Page
1.0 Introduction .....	4
2.0 Analytical Services Contact List .....	4
3.0 Superfund Analytical Services .....	6
3.1 Introduction .....	6
3.2 Superfund Contract Lab Program (CLP) Routine Analytical Services .....	7
3.2.1 Available CLP RAS Contracts Statements of Work (SOW) .....	7
3.3 Regional Delivery of Analytical Services (DAS) .....	8
4.0 Non-Superfund (NSF) Analytical Services .....	8
5.0 Requesting/Scheduling RAS, DAS, NSF Analytical Services .....	8
6.0 Procedure for Preparing Analytical Services Request Form .....	8
7.0 Preliminary Results (PRs)/Unvalidated Data .....	10
8.0 Electronic Data Deliverables .....	10
9.0 Data Validation .....	11
10.0 Paperwork Requirements for RAS, DAS and NSF .....	12
10.1 CLP RAS Paperwork Requirements .....	12
10.1.1 FORMS II LITE .....	12
10.1.2 Electronic Sample Documentation System (ESDS) .....	13
10.1.3 Emergency TR/COC Forms .....	13
10.1.4 CLP RAS Sample Numbering and Labeling .....	13
10.1.5 Communicating Shipping Information .....	14
10.2 DAS Paperwork Requirements .....	14
10.2.1 Chain of Custody .....	14
10.2.2 DAS Sample Numbering and Labeling .....	14
10.2.3 Communicating Shipping Information .....	14
10.3 ASQAB Laboratory Paperwork Requirements .....	15
10.3.1 Chain of Custody .....	15
10.3.2 Sample Numbering and Labeling .....	15
10.3.3 Communicating Shipping Information .....	15
11.0 Paperwork Corrections/Letter-to-File .....	16
11.1 RAS Letter-to-File Distribution .....	16
11.2 DAS Letter-to-File Distribution .....	17
11.3 ASQAB Letter-to-File Distribution .....	17
12.0 Sample Projections for RAS and DAS Analytical Services .....	17
13.0 Reporting non-CLP Acquisitions to Analytical Services Tracking System (ANSETS) .....	18
14.0 Field Log Book Documentation .....	18
Appendix A - ASQAB Analytical Services Procurement Process .....	20
Appendix B - Analytical Request Form .....	21
.....	

## 1.0 Introduction

The Analytical Services and Quality Assurance Branch (ASQAB) provides centralized analytical services and quality assurance support for Region III. The Client Services Team (CST) serves as a broker of analytical and technical services for the regional programs, and assists field personnel with the procedures for packaging, shipping, and documenting environmental sampling events. The Client Services Team coordinates and manages the acquisition of analytical services through the following mechanisms:

Regional Program/Division	Service Description	Mechanisms Used
Superfund	Routine Analytical Services (RAS) – Fixed price routine analytical services OR services from ASQAB Lab	Contract Laboratory Program (CLP) ASQAB Lab
Superfund	Delivery of Analytical Services (DAS) – Analytical services needed by Superfund that are not available from the CLP	ASQAB Lab Commercial lab procurements Field Contractors or IAGs
WCMD WPD OECEJ APD CID EAID Other	Non-Superfund (NSF) - Analytical services provided to the non-Superfund programs of Region III	ASQAB Lab Commercial lab procurements Buy-in to CLP or ESAT

NOTE: EPA Order 5360.1 A2 (May 2000) requires the use of a systematic planning approach to develop acceptance or performance criteria and an approved QAPP prior to sampling and analysis. The QAPP is used as a tool by project managers to document the type and quality of data needed for environmental decisions and are used as a blueprint for the collection and assessment of data for all Agency environmental programs.

## 2.0 Analytical Services Contact List

Service	Primary Contact	Secondary Contact
<b>Superfund Contract Laboratory Program (CLP)</b>		
<b>Regional Sample Control Center (RSCC)</b> <b>RAS Scheduling Coordinator</b> <b>RAS Problem Resolution &amp; Letters</b> <b>Data Package/Mail Receiving</b> <b>RSCC Database Tracking</b> <b>Request for Paperwork/Tags</b> <b>FORMS II LITE</b> <b>CST Database</b>	<b>B. Jeffery</b> <b>B. Jeffery</b> <b>D. Slizys</b> <b>D. Slizys</b> <b>B. Jeffery</b> <b>J. Snyder (ESAT)</b> <b>D. Slizys</b> <b>J. Kwedar</b>	<b>D. Slizys</b> <b>D. Slizys</b> <b>B. Jeffery</b> <b>B. Jeffery</b> <b>J. Snyder (ESAT)</b> <b>B. Jeffery</b> <b>B. Jeffery</b> <b>B. Jeffery</b>
<b>CLP Project Officer (CLP PO)</b> <b>RAS Rejection/Reduced Invoice Payment</b> <b>RAS CLP PE Requests</b>	<b>D. Slizys</b> <b>D. Slizys</b> <b>D. Slizys</b>	<b>K. Thaug</b> <b>K. Thaug/R. Donovan</b> <b>K. Thaug</b>
<b>CLP Sample Projections</b>	<b>D. Slizys</b>	<b>B. Jeffery</b>
<b>RAS/ DAS CSF Evidence Audit</b>	<b>J. Kwedar</b>	<b>B. Jeffery</b>
<b>CLP Analytical Services Support (CLASS) Contractor Coordinators</b>	<b>Michael Benhoff</b> (DYNCORP)	
<b>ESDS</b>		
<b>Superfund Delivery of Analytical Services (DAS)</b>		
<b>DAS Project Officer</b> <b>DAS Scheduling Coordinator</b> <b>DAS Problem Resolution &amp; Letters</b> <b>DAS Rejection/Reduced Invoice Payment</b> <b>DAS PE Request</b> <b>DAS Bid Solicitations</b> <b>DAS Invoice Inventory</b> <b>DAS CSF Evidence Audit</b> <b>DAS Bank Card Procurements (&lt;\$2,500.00)</b> <b>DAS Procurements (&gt;\$2,500 to \$25,000.00)</b> <b>DAS Procurements (&gt;\$25,000.00)</b>	<b>J. Kwedar</b> <b>J. Kwedar</b> <b>J. Kwedar</b> <b>J. Kwedar</b> <b>K. Thaug</b> <b>J. Kwedar</b> <b>M. Mehr</b> <b>J. Kwedar</b> <b>R. Donovan</b> <b>R. Donovan</b> <b>S. Ozer (CO)</b>	<b>K. Thaug</b> <b>K. Thaug</b> <b>K. Thaug</b> <b>K. Thaug</b> <b>D. Slizys</b> <b>K. Thaug/R. Donovan</b> <b>J. Kwedar</b> <b>K. Thaug</b> <b>B. Jeffery</b> <b>S. Ozer (CO)</b>
<b>ESAT Regional Project Officer</b> <b>Non-CLP Data Tracking (ANSETS)</b>	<b>K. Thaug</b> <b>Willie Wong (ASB)</b>	<b>F. Foreman</b> <b>D. Slizys</b>
<b>Non-Superfund (NSF) Analytical Services</b>		
<b>Non-Superfund Scheduling Coordinator</b> <b>Non-Superfund Problem Resolution</b>	<b>J. Kwedar</b> <b>J. Kwedar</b>	<b>K. Thaug</b> <b>K. Thaug</b>
<b>ASQAB Laboratory Sample Coordinator</b>	<b>P. Sosinski</b>	<b>C. Harris</b>

## Contact Information

### Client Services Team

Ruth Ann Donovan	(410) 305-2662	donovan.ruthann@epa.gov
Betty Ann Jeffery	(410) 305-2601	jeffery.betty@epa.gov
John Kwedar	(410) 305-3021	kwedar.john@epa.gov
Marcie Mehr	(410) 305-2678	mehr.marcie@epa.gov
Diane Ogden	(410) 305-2737	ogden.diane@epa.gov
Daniel Slizys	(410) 305-2734	slizys.dan@epa.gov
Khin Cho Thaug	(410) 305-2743	thaung.khin-cho@epa.gov
Fax #:	(410) 573-3095	
E-mail		R3 Clients@epa.gov (internal only)

### ASQAB Laboratory

Pat Sosinski	(410) 305-2667	sosinski.pat@epa.gov
Carroll Harris	(410) 305-2625	harris.carroll@epa.gov

### Regional Contracting Officer

Sidney Ozer	(215) 814-5305	ozersidney@epa.gov
-------------	----------------	--------------------

### CLP Contractor Support

Michael Benhoff (CLASS)	(703) 818-43576	michael.benhoff@dyncorp.com
Judy Snyder (ESAT)	(410) 305-3015	snyder.judy@epa.gov

### EPA OSRTI/Analytical Services Branch (ASB)

Willie Wong	(703) 603-8846	wong.willie@epa.gov
-------------	----------------	---------------------

## 3.0 Superfund Analytical Services

### 3.1 Introduction

Region III has fully implemented the tiered **Field and Analytical Services Technical Advisory Committee** (FASTAC) Strategy by establishing a centralized analytical services brokerage. This centralized approach channels all analytical requests through the Client Services Team. The brokerage applies the FASTAC tiered decision approach to determine where samples will be analyzed. This process provides the region control over the process and reserves field contractor subcontracting (Tier 4) for emergency responses and other unique circumstances.

The Client Services Team is supported by the Quality Assurance Team for QAPP/SAP approvals and QC. The Region 3 ASQAB Lab (Tier 1) primarily analyzes non-routine or DAS samples. The ESAT contract provides services for data validation, analysis of samples and CEAT audits.

The brokerage is based on the **FASTAC Tiered Hierarchy**, as follows:

<b>Tier 1:</b>	<b>U.S. EPA Regional Laboratory</b>
<b>Tier 2:</b>	<b>Contract Laboratory Program</b>
<b>Tier 3:</b>	<b>Delivery of Analytical Service through Commercial Laboratories</b>
<b>Tier 4:</b>	<b>Field Contractor Subcontracting for Analytical Services</b>

Some field contractor subcontracting is permitted due to emergencies, labile nature of samples, short holding times, proximity of lab services and for services that are not provided by the CLP or the EPA Regional Lab. As a measure of control, field contractors must provide a documented justification form for approval to EPA site program officials prior to subcontracting;

### **3.2 Superfund Contract Laboratory Program (CLP) Routine Analytical Services (RAS)**

The Superfund Contract Laboratory Program (CLP) is a national contract mechanism for obtaining Routine Analytical Services (RAS) for Superfund related field activities, including preliminary site inspections, remedial activities, monitoring, enforcement actions, or removal actions. The CLP provides a suite of fixed price contracts with standardized **Statements of Work (SOW)** for the analysis of water and soil/sediment samples to determine organic and inorganic contaminants. Modifications to the routine SOWs are also available through **flex clauses**. The EPA project lead can request a flex clause to modify the SOW to include additional compounds to the TCL list, lower quantitation limits, additional cleanup options, sample preparation options, or other requirements specific to site QAPP/SAP criteria.

The CLP is centrally managed by the Analytical Services Branch (ASB) within the Office of Superfund Remediation & Technology Innovation (OSTRI). The Contract Laboratory Program Project Officers (CLP POs) monitor the performance of CLP laboratories and provide technical support.

Regions schedule CLP samples through their Regional Sample Control Center (RSCC), which coordinates with ASB's contractor identified as Contract Laboratory Analytical Support Services (CLASS) or SMO. The CLASS contractor provides management, operation, and administrative support to the CLP. The CLASS contractor routinely receives Regional analytical requests, coordinates and schedules sample analyses, and tracks sample shipments.

The most current CLP SOWs and other information are available on the Internet at the following web site: <http://www.epa.gov/superfund/programs/clp/analytic.htm>

#### **3.2.1 Available CLP RAS Contracts Statements of Work (SOW)**

##### **CLP SOW OLM04.3**

Organic Analysis: Multi-Media, Multi-Concentration offers 7, 14, or 21day turnaround times (TAT), with preliminary results (PR)/unvalidated data available for Volatiles in 48 hours, for Semi-volatiles and Pesticides/PCBs in 72 hours. Electronic diskette deliverable is required.

##### **CLP SOW OLC03.2**

Organic Analysis: Low Concentration drinking water levels, offers 7, 14 or 21day turnaround times, with preliminary results (PR)/unvalidated data available for Volatiles in 48 hours, for Semi-volatiles and Pesticides/PCBs in 72 hours. Electronic diskette deliverable is required.

##### **CLP SOW ILM05.3**

Inorganic Analysis: Multi-Media, Multi-Concentration offers 7, 14, or 21 day turnaround times,

with preliminary results (PRs)/unvalidated data available in 72 hours. The SOW offers low-medium and low drinking level analytical services. Electronic diskette deliverable is required.

### **3.3 Regional Delivery of Analytical Services (DAS)**

The DAS program provides specialized analyses which are not available through the CLP. A combination of the ASQAB Lab and procurement of services from commercial labs comprise the process. All DAS acquisitions are established and managed by EPA Region III. A team of Region III Contracting Officers and ASQAB/CST Project Officers manage the program.

The matrices range from sludge, air, tissues, and individualized site wastes. Analytes can be anything from common metals to proprietary compounds for which there is very little historical data. DAS uses a wide variety of analytical services sources to fulfill customer's special needs.

### **4.0 Non-Superfund (NSF) Analytical Services**

The ASQAB Laboratory provides analytical services support to other regional non-Superfund programs. Some of the programs supported are RCRA, TSCA, Water, Air, NPDES, CID, EAID, CBP and OECEJ. Since most of these programs and offices have regulatory limits or criteria, the EPA laboratory staff provides not only analytical support but also expert witness testimony in litigation procedures for these programs. More information on ASQAB Lab services is available at the following Internet link: <http://www.epa.gov/region3/esc/labservices.htm>

### **5.0 Requesting/Scheduling RAS, DAS and NSF Analytical Services**

Region III field personnel or program personnel are responsible for initiating and submitting analytical requests. The intent of this guidance is to assist Region III project managers, site leaders and field personnel in the preparation and submittal of requests for the Superfund Contract Laboratory Program's Routine Analytical Services (RAS), Superfund Delivery of Analytical Services (DAS), and non-Superfund (NSF) analytical services. The Client Services Team (CST) secures lab space, notifies customers of lab assignments, receives and provides shipping information, and assists in problem resolutions. For a more detailed description of ASQAB's Analytical Services Procurement process see Appendix A.

### **6.0 Procedure for Preparing Analytical Services Request Form**

All requester must complete and submit the Analytical Services Request Form when requesting analytical services. It is requested that completed form be submitted at least two weeks prior to the commencement of sampling. The form can be found in Appendix B.

NOTE: Preparer completes the Analytical Request Form fields in **Bold Print**. More specific instructions are in *bold italics*.

#### **Administrative Process Fields:**

RAS #: assigned by RSCC/CLASS

DAS #: assigned by CST

NSF #: assigned by CST

Date: entered by CST upon receipt of request form

**QAPP/SAP:** *enter name and date of approved QAPP/SAP/FSP*

**Data Validation Level:** *enter data validation level required for request. See Section 9.0 for details*

**Site Specific Information Fields:**

**Site:** *use the NPL-listed site name*

**Address:**

**City:**

**State:** *use the Post Office two letter codes*

**Latitude:**

**Longitude:**

**Program:** *enter Superfund, RCRA, NPDES, TSCA, etc.*

**CERCLIS #:**

**Account #:** *enter Program Results Code (PRC) or other account #*

**Activity:** *SI, RI/FS, Removal, inspection, etc.*

**Operable Unit:**

**Spill ID:**

**Site Specific Points of Contact Fields:**

**Preparer/Phone/Fax/E-mail:**

**OSC/RPM/ Phone/Fax/E-mail/Mail Code:**

**Site Leader/ Phone/Fax/E-mail:**

**Site Specific Contractor Identification Fields:**

**EPA CO:** *enter name of CO for field contractor*

**Contract Type:** *enter contract type, e.g., START, RACS*

**Prime:** *enter name of Prime Contractor*

**Sub:** *enter name of Subcontractor*

**Turnaround Time (TAT) & Shipment Information Fields:**

**Analytical TAT:** *enter TAT time in calendar days. If unvalidated data are needed, see section 7.0 for guidance in completing this field. Note: Quick TATs increase analytical cost.*

**Analytical + Validation TAT:** *enter TAT time in calendar days, or date when the final hard copy report is needed*

**Ship Date From:** *enter date when samples will begin to be shipped*

**Ship Date To:** *enter date when last samples will be shipped*

**Sample & Analytical Information Fields**

**Samples:** *enter the number of samples, including the field QC samples*

**Method:** *identify the preparation/extraction and analytical method(s) selected in the approved QAPP/SAP/FSP.*

**Parameter:** *identify specific analytes or compounds of interest. This information should be in the approved QAPP/SAP/FSP. Attach a separate electronic file that lists the compounds or analytes by their CAS number and the Quantitation limits (QLs) required. If such list is included in the approved QPP/SAP/FSP, include the reference.*

**Matrix:** *identify the specific matrix of the samples (e.g., drinking water, surface water, groundwater, non- aqueous)*

**Instructions:** indicate special instructions or unique requirements such as:

- Type and format of deliverables required. See section 9 for more information.
- Note for unvalidated data, section 7.0.
- Special laboratory delivery instructions.

After the preparer completes the entry of all pertinent data, the request is either emailed to the EPA project lead (RPM, OSC, etc.) for approval and forwarded to **R3 Clients** Superfund RAS and DAS), or emailed directly to **R3 Clients** (NSF).

Analytical Requests will not be processed until the approved QAPP/SAP/FSP is on file at the ESC at Fort Meade. If the approved QAPP/SAP/FSP is not on file, the document should be emailed to **R3 ESC-QA**, or sent by FedEx to USEPA Region III, Quality Assurance Team, attn: May Edwards, Environmental Science Center, 701 Mapes Road, Fort Meade, MD 20755-5350.

## 7.0 Preliminary Results (PRs)/Unvalidated Data

Preliminary Results (PRs) are **unvalidated data**. Please Note: Preliminary results have not undergone an independent data review and results may change in the final validated report. They are available from the ASQAB Lab, the CLP labs and the DAS commercial labs. If you require **unvalidated data**, indicate such in the Analytical TAT section and specify in the **Instructions** section when you need it and in what electronic format. You will receive an electronic file containing your data by the date specified.

## 8.0 Electronic Data Deliverables

CLP laboratories are required to provide an electronic diskette as part of their CLP deliverables. SMO uses the electronic deliverable in Contract Compliance Screening (CCS) to determine contract compliance and Computer Aided Data Review and Evaluation (CADRE) to compare quality control data against data review criteria. This process is known as the **Data Assessment Tool (DAT)**. Once the data is screened by CCS and CADRE, it is placed in a database accessible by the EPA project lead through the Internet. This data is available about three days after the Analytical TAT specified in the Analytical Services Request form. DAT data is not validated data but it has been assessed by CCS and CADRE. DAT data is available as a spreadsheet or as a database electronic file. For more information on DAT, please visit the following Internet web site:

<http://www.epa.gov/superfund/programs/clp/dat.htm>. If you wish to gain access to the DAT database, please contact Dan Slizys at 410-305-2734, email [slizys.dan@epa.gov](mailto:slizys.dan@epa.gov).

Electronic data is also available in a variety of formats. There is a deliverable called a Superset which was developed by Region 5. It is an electronic deliverable specifically mapped in an EXCEL format. Most of the laboratories which provide analytical services can provide electronic data deliverables. The electronic data deliverables can be downloaded into the end users' computer which facilitates the end user to more quickly assess data and make decisions. The preparer must indicate the software (Lotus, Microsoft) and format (spreadsheet or database) of the EDD. Electronic data deliverables must be specified in the **Instructions** section of the Analytical Services Request form.

## 9.0 Data Validation

All Superfund analytical results produced by CLP, DAS labs or other contract labs must be validated. The data validation functions are performed by the Region III ESAT data review team. All data packages received by ASQAB's RSCC are transferred directly to ESAT for processing.

NOTE: Analytical results (both Superfund and non-Superfund) produced by the ASQAB Lab are validated in house. Analytical results produced by a commercial lab for a NSF request **are not validated**, unless the EPA project lead requests and arranges for validation by an independent organization or through a "buy in" to the ESAT contract.

All data is validated using the Region III Modifications to the CLP National Functional Guidelines, and follows the Innovative Approaches to Data Validation, which identifies various levels of validation based on the use(s) of the data. On the Analytical Services Request form, the data validation level is specified in the **Data Validation Level** section, and the requested turnaround time or date for a validated data package is specified in the **Anal + Val Data TAT** section. If no TAT is specified, the data package will be assigned a validation TAT approximately equal to the Analytical TAT.

Following is a summary of the validation levels:

### Organic Data Validation

- M1: CADRE and manual verification of positive hits (blanks checked for contamination)
- M2: CADRE and manual QC verification
- M3: CADRE plus full manual validation

### Inorganic Data Validation

- IM1: CADRE and manual QC verification
- IM2: CADRE plus full manual validation

Following is a table describing recommended data validation levels based on data use:

<b>Region III Data Validation Data Uses Matrix</b>					
<b>Data Uses</b>	<b>Organic Tiers</b>			<b>Inorganic Tiers</b>	
	<b>M1</b>	<b>M2</b>	<b>M3</b>	<b>IM-1</b>	<b>IM-2</b>
Oversight	X		X	X	X
Action Level Comparison	X		X	X	X
Initial Investigation		X	X	X	X
Nature & Extent		X	X	X	X
Preliminary Risk Assessment		X	X	X	X
Risk Assessment with Known High Level Toxins		X	X	X	X
Feasibility Study		X	X	X	X
Treatability Study		X	X	X	X

<b>Region III Data Validation Data Uses Matrix</b>					
<b>Data Uses</b>	<b>Organic Tiers</b>			<b>Inorganic Tiers</b>	
Preliminary Design		X	X	X	X
Initial Cleanup Verification		X	X	X	X
Risk Assessment with Marginal Risk			X		X
Low Level Contamination Nature & Extent			X		X
Cleanup Near Detection or Action Levels			X		X
Uses in Courts			X		X
Controversial Site			X		X

## 10.0 Paperwork Requirements for RAS, DAS and NSF

Each analytical service has specific paperwork requirements. These paperwork requirements are summarized below. The Client Services Team will inform the customer which service was procured for analytical services and what type of paperwork is required for sample submission.

NOTE: The ASQAB Lab has its own paperwork requirements for both Superfund and non-Superfund analyses as specified below. Other NSF services follow the DAS paperwork requirements.

### ANALYTICAL SERVICES PAPERWORK REQUIREMENTS

<b>Paperwork</b>	<b>RAS</b>	<b>DAS/Other NSF</b>	<b>ASQAB (SF and NSF)</b>
Chain-of-Custody	X	X	X
Hazard /Risk Sheet	NR	NR	X
Sample Numbering	X	X	NR
Sample Label & Tags	X	X	X
Sample Seals	X	X	X
Communicate Shipping Information	X	X	X

X = Required  
NR = Not required

## 10.1 CLP RAS Paperwork Requirements

### 10.1.1 FORMS II LITE

**FORMS II LITE (F2L) is the mandatory electronic format for the Traffic Report/Chain-of-Custody (TR/COC) for all CLP requests.** FORMS II LITE is an electronic windows based application which automates sampling event documentation. It generates a Traffic Report/Chain-of-Custody Form, sample tags, and container labels. FORMS II LITE can be used for all Superfund analytical services -- RAS and DAS. Access to FORMS II LITE software is available for downloading at:  
<http://dyncsdao1.fedcsc.com/itg/forms2lite/>

### **10.1.2 Electronic Sample Documentation System (ESDS)**

ESDS is a tool that allows FORMS II Lite Extensible Markup Language (XML) files to be uploaded and saved to a database. The data from the XML files is collected by SMO and used to provide shipping information to Contract Laboratory Program (CLP) laboratories. FORMS II Lite users may now submit FORMS II Lite XML files to SMO via ESDS. The F2L user (field contractors) can use this system to satisfy the ANSETS requirement by sending all DAS and their subcontracted analytical services as TR/COC files to SMO.

Instructions for Submitting FORMS II Lite TM XML TR/COCs to the Sample Management Office (SMO) via the Electronic Sample Documentation System (ESDS) can be found at the following Internet web site:  
<http://www.epa.gov/superfund/programs/clp/download/esdsprocedures.pdf>

For general questions or problems concerning ESDS please contact your SMO Coordinator. For questions or problems concerning FORMS II Lite, please contact the FORMS II Lite Help Desk at [f2lite@dvncorp.com](mailto:f2lite@dvncorp.com) or (703) 818-4200.

### **10.1.3 Emergency TR/COC Forms**

There may be occasions or conditions when your field computer fails. Emergency TR/COC Forms were created for those situations. You should download these forms and keep copies of these for emergency use. The URL address for the forms is as follows:  
<http://www.epa.gov/superfund/programs/clp/trcoc.htm>

### **10.1.4 CLP RAS Sample Numbering and Labeling**

FORMS II LITE generates unique sample numbers that must be assigned to each organic and inorganic sample. The CLP Sample Numbers are printed on adhesive labels by the F2L software. You may also obtain unique sample numbers from SMO.

Organic Sample Numbers are in this format CXXXX, (five characters), and have ten labels per strip: four for extractables, two for volatiles and four extra.

Inorganic Sample Numbers are in this format MCXXXX, (six characters), and have seven labels per strip: two for Total Metals, two for Cyanide and three extra. Remember dissolved (field filtered) metals aliquots **MUST** be given a separate CLP Sample Number from total (unfiltered) metals aliquots.

Remember that the unique Sample Number must be used only once. **DESTROY THE UNUSED LABELS** to prevent duplication of sample numbers.

### 10.1.5 Communicating Shipping Information

Notify the CLASS Coordinator and the region of all CLP sample shipments within 24 hours of shipment by e-mail. **CLASS must be notified by 3:00 PM on Friday for samples intended for Saturday delivery.** The following information is required:

Case Number  
Name of Laboratory  
Date of Shipment  
Overnight Carrier (FedEx) Airbill number  
Number and Matrices (Waters, Soils, etc.) of samples shipped  
Information on completions, changes, delays continuations, etc.  
Sampler's name and Phone number

## 10.2 DAS Paperwork Requirements

### 10.2.1 Chain of Custody

Region III uses FORMS II LITE (F2L) for chain of custody documentation for DAS samples. The documentation is used to ensure that the integrity and possession of the samples is maintained from the time the samples are collected, delivered to the laboratory and to the time they are introduced as evidence in legal proceedings. The relinquisher (field sampler) must sign and date the form, place it into the cooler, seal the cooler lid with tape and place a seal custody between the lid and walls of the cooler. For more details on F2L, see Section 10.1.1.

### 10.2.2 DAS Sample Numbering and Labeling

DAS requests are assigned a DAS Number by the CST. All DAS Numbers are expressed as follows: **R3XXX**. DAS organic and inorganic sample identification numbers consist of (7) characters (R3XXX00). The DAS Number (R3XXX) is the beginning of the DAS sample identification number. The last two characters are assigned by the sampler to create a unique sample identification number. The last two characters in the identification number can be expressed in any numeric or alphanumeric combination. A filtered sample must be assigned a distinct and separate number. Preprinted sample labels will not be provided for DAS samples. FORMS II LITE software will generate DAS sample ID numbers.

Example of DAS Sample Identification Number:

DAS Request Number is: R3222

DAS Sample Identification Number is: R3222**01** (where 01 is sample identifier)

### 10.2.3 Communicating Shipping Information

**Notice of shipping information for DAS cases** must be e-mailed to the CST within 24 hours of shipment. Information for **SATURDAY DELIVERIES** must be requested by

e-mail to the CST by 3:00 p.m. on Friday so that the laboratory may be notified. The following shipment information is required:

Case Number  
Name of Laboratory  
Date of Shipment  
Overnight Carrier (FedEx) Airbill number  
Number and Matrices (Waters, Soils, etc.) of samples shipped  
Information on completions, changes, delays continuations, etc.  
Sampler's name and Phone number

### **10.3 ASQAB Laboratory Paperwork Requirements**

The ASQAB Laboratory has specific paperwork requirements for all samples - RAS, DAS, and NSF. The requirements are summarized below. Please refer to Sample Submission Procedures for the Analytical Services & Quality Assurance Lab, current version. It can be found at the following Internet link: <http://www.epa.gov/region3/esc/labservices.htm>, then click on "Sample Submission Guidelines."

#### **10.3.1 Chain of Custody**

**FORMS II LITE or EPA Chain-of-Custody form** must be completed and must accompany each sample shipment.

#### **10.3.2 Sample Numbering and Labeling**

**The ASQAB Lab does not have a specified sample numbering system.** Samplers should use their own identification system for sample numbering.

**Each sample container must have a sample label and tag.** The information on the sample label and tag must be written with indelible (water proof) ink and must match the information on the Chain-of-Custody form.

**The sample shipping coolers must be sealed with strapping tape and EPA custody seals on the outside.** The custody seal must be placed so that it will be broken when the cooler is opened.

#### **10.3.3 Communicating Shipping Information**

**Shipment information** to the ASQAB Lab must be communicated directly to the ASQAB Lab Sample Scheduling Coordinator by e-mail within 24 hours of shipment. There is no Saturday delivery available to the ASQAB Lab. The following shipment information is required:

Case Number  
Date of Shipment  
Overnight Carrier (FedEx) Airbill number  
Number and Matrices (Waters, Soils, etc.) of samples shipped  
Information on completions, changes, delays continuations, etc.  
Sampler's name and Phone number

## 11.0 Paperwork Corrections/Letter-To-File

Shipping samples requires an enormous amount of paperwork. The key to error free paperwork is to have everything (COC, tags, labels, FedEx forms) filled out before sampling and to provide adequate time during sampling to check the paperwork. The CST or ASQAB Lab Sample Scheduling Coordinator will inform the sampler when there is an error or discrepancy noted by the laboratory on the paperwork. The procedure for correcting errors and omissions on original legal documents are provided below:

- Errors and discrepancies discovered on paperwork prior to shipment of samples from the field are corrected by drawing a single line through the error and entering the correct information. Each correction must be initialed and dated.
- All paperwork errors and discrepancies discovered post shipment must be corrected by a letter-to-file.
- A “corrected” photocopy of the original or and “amended” record (chain-of-custody, sample tags) CANNOT be sent to the laboratory.

To correct errors or discrepancies on paperwork after the samples have been shipped to the laboratory, the sampler must write and distribute a “letter-to-file.” A letter-to-file is a business letter on company letterhead, addressed to the laboratory sample custodian or other designated laboratory personnel, and distributed as specified in Sections 11.1 - 11.3 below. Include a synopsis of the error which occurred and an explanation of the information which should have been sent or the action which should have occurred. It must be in a business letter format and signed by the sampler or project manager, if the original sampler is not available. A separate letter-to-file must be written for each separate case number and laboratory involved.

Do not include the site name and location when writing a memo-to-file to contracted laboratories. Refer to the site by the case number and Region, e.g., Region III, Case 23432. For samples which are sent to the ASQAB Lab, the procedures for correcting the paperwork errors is the same with the following exceptions: (1) use the site name and location since case numbers are not assigned, and (2) CLASS does not receive a copy.

Include all pertinent case information. At a minimum include:

- (1) carrier used
- (2) airbill number
- (3) date of shipment
- (4) sample number(s)
- (5) sample station location
- (6) time and date of sampling
- (7) sample tag number(s)
- (8) document number which is found on the bottom right-hand corner of the chain-of-custody record.

Upon receipt of the memo-to-file by the laboratory, it becomes part of the evidentiary file for that case.

Although there is no time limit for correction of the errors and discrepancies, the memo-to-file must be written as soon as an error is discovered.

### 11.1 RAS Letter-to-File Distribution

At least four copies of the original must be made with distribution as follows: (1) original to the laboratory, (2) copy to RSCC, (3) copy to CLASS, and (4) copy to the EPA Project Manager for the site. You may be distributing other copies, such as a copy to your company's central site files.

### **11.2 DAS Letter-to-File Distribution**

At least three copies of the original must be made with distribution as follows: original to the laboratory, copy to RSCC, and copy to the EPA Project Manager of the site. You may distribute other copies, such as a copy to your company's central site files.

### **11.3 ASQAB Letter-to-File Distribution**

At least two copies of the original must be made with distribution as follows: original to the ASQAB laboratory, and copy to the EPA Project Manager for the site. You may distribute other copies, such as a copy to your company's central site files. For samples which are sent to ASQAB, use the site name and location since case numbers are not assigned.

## **12.0 Sample Projections for RAS and DAS Analytical Services**

The Contract Laboratory Program (CLP) needs sample analysis projections for Routine Analytical Services (RAS) quarterly so adequate laboratory capacity is reserved for the various analytical service contracts. Region III also requires quarterly projections for DAS analytical services.

Summarized quarterly projections must include a cover memorandum which lists sites that will be sampled during the next quarter. Electronic files in Microsoft Word to input summary projection data are provided upon request by the CST. There are three separate files: 1) ORGANIC RAS form, 2) INORGANIC RAS form and 3) DAS form. The ORGANIC RAS and INORGANIC RAS forms will have Statement of Work fractions listed and their associated turn around times. The DAS form requires the preparer to fill in the parameter and the number of samples to be sampled for each month of the quarter. Include site names with sample projections. Unique matrix information can be submitted in the cover memorandum.

### **Sample Projection Reporting Due Dates:**

First Quarter: August 10  
Months: October, November, December

Second Quarter: November 10  
Months: January, February, March

Third Quarter: February 10  
Months: April, May, June

Fourth Quarter: May 10  
Months: July, August, September

Quarterly projections should be e-mailed to [slizys.dan@epa.gov](mailto:slizys.dan@epa.gov) and [jeffery.betty@epa.gov](mailto:jeffery.betty@epa.gov), telephone 410-305-2734, fax 410-305-3095.

### 13.0 Reporting non-CLP Acquisitions to Analytical Services Tracking System (ANSETS)

OSWER Directive 9240.02 requires the use of Analytical Services Tracking System (ANSETS) to collect all non-CLP Superfund analytical services data. OSWER Directives 9240.02A and 9240.02B identified the responsible parties for the collection of non-CLP Superfund analytical services. Non-CLP analytical services refer to any Superfund services that are not acquired or generated through CLP Routine Analytical Services (RAS). Superfund activities are those which are funded by Superfund or involve work at a Superfund site. Analytical services include any analytical data generated by fixed labs, mobile labs, portable equipment, and test kit analysis. Non-CLP analytical services participating parties include EPA laboratories, field contractors and their subcontractors, states, other federal facilities, and potentially responsible parties (PRP).

Field contractors must provide monthly reports on all non-CLP analytical services (field tests, mobile lab and fixed lab) and submit in electronic format directly to Willie Wong at the EPA Analytical Services Branch (ASB). Directions for submission are on the internet address as follows:  
<http://www.epa.gov/superfund/programs/clp/ansets.htm>.

The sample management office (SMO) is offering **Electronic Sample Documentation System (ESDS)** for FORMS II LITE (F2L) users to export TR/COC files to SMO. The F2L user (field contractors) can use this system to satisfy the ANSETS requirement by sending all DAS and subcontracted analytical services as TR/COC files to SMO. See Section 10.1.2 for more information.

### 14.0 Field Log Book Documentation

Regardless of the type of analytical service provided, samplers must maintain a Log Book that documents the field activities. The information from the field logbooks becomes evidence and can be used in court. The following list is criteria for a field log book:

- Use a bound notebook
- Use indelible ink for entries
- Field log book entries should be factual, detailed, and objective
- Date and time all entries
- Each individual page must be signed by the person recording the information
- USEPA recommends that log book entries be reviewed. Include reviewer signature and date of review.

Examples of field log book entries:

- Date and time of entry
- Purpose of sampling
- Name, address, and affiliation of personnel performing sampling\
- Name and address of the responsible party, if known
- Type of sample, e.g.; sludge or wastewater
- Description of sample container
- Description of sample

- Chemical components and concentrations, if known
- Number and size of samples taken, including the corresponding sample tags numbers for each analytical fraction
- Description and location of the sampling point
- Date and time of sample collection
- Difficulties experienced in obtaining sample
- Visual references such as: maps or photographs of the sampling site. Include the film roll number, the frame number, and a written description of the picture for photographs
- Field observations, such as weather conditions during sampling periods
- Field measurements of the materials, e.g., conductivity, pH, temperature
- Whether chain-of-custody forms have been filled out for the samples; chain-of-custody form numbers
- GIS, GPS, related information (latitude and longitude) for site and each sampling location: if known
- Lab name, address and date shipped

## APPENDIX A

### ASQAB Analytical Services Procurement Process

#### **CLP RAS and DAS**

For Superfund CLP RAS and DAS requests, the process begins with the field sampler preparing an electronic Analytical Services Request form. The form is then submitted via email to the Regional Project Manager (RPM), On Scene Coordinator (OSC), Site Assessment Manager (SAM) or other EPA project lead for approval. The EPA project lead approves and forwards the request via email 4 weeks prior to the sampling event to the Client Services Team (CST) at email group **R3 Clients**.

The CST forwards the request to the ASQAB's Quality Assurance (QA) Team. The QA Team determines whether the request matches the data requirements in the approved Quality Assurance Project Plan (QAPP) or site -specific Sampling and Analysis Plan (SAP). After the assessment by the QA Team, the CST applies the FASTAC decision tree to determine which analytical service would be most cost effective and meets the needs of the project.

CST then submits the request for ASQAB Lab's consideration. If the ASQAB Lab accepts the request, the ASQAB Lab Sample Scheduling Coordinator will forward the acceptance notice to CST, who notifies the field sampler. If the ASQAB Lab declines the request, CST can process the request in one of two ways:

- (1) If the selected service is RAS, the CST will coordinate with SMO to schedule the work at a CLP lab and provide the lab assignment to the field samplers. Lab assignments are provided on a rolling schedule, the day after receiving the request. For example, if a request is submitted on a Monday by 3:00 p.m., lab assignments are available by noon on Tuesday. For requests that are submitted two or more weeks in advance of the sampling event, lab assignments are provided on the Tuesday one week before the sampling event. Requests submitted after 3:00 p.m. on Thursday will receive lab assignments on the following Monday.
- (2) If the selected service is DAS, the CST procures analytical services from commercial laboratories. The CST Contracting Officer (CO) has a warrant for awards less than \$25,000.00. The CO makes the awards to the labs and notifies the sampler where to ship the samples. For analytical requests greater than \$25,000.00, the CST prepares a solicitation file and provides it to the CO in the Regional Office in Philadelphia for solicitation and award. The Regional Office CO will notify the field contractors which laboratory was awarded the contract and provide shipping information.

#### **Non-Superfund**

For Non-Superfund (NSF) analytical services, the field sampler prepares an electronic Analytical Services Request form and emails the form at least 4 weeks prior to the sampling event to the Client Services Team (CST) at email group **R3 Clients**.

The CST forwards the request to the ASQAB managers for concurrence and for ASQAB Lab's consideration. If the ASQAB Lab accepts the request, the ASQAB Lab Sample Scheduling Coordinator will schedule the request for analysis with the sampler. If the ASQAB Lab declines the request, the CST will solicit requests for bids from commercial labs. If the bids are less than \$25,000.00, the CST will contact the program officials to receive funding information so that commercial lab services can be procured and samples scheduled. For bids greater than \$25,000.00, the CST will prepare a solicitation file and provide it to the CO in the Regional Office in Philadelphia for solicitation and award. The Regional CO will contact the program officials to arrange funding for the analytical services. The Regional CO will notify the sampler which laboratory is awarded the contract and provide shipping information.

